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**From:** Dollhopf, Ralph [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AA4120E31A1E4A1285F5D7853816A74A-RDOLLHOP]  
**Sent:** 12/27/2018 4:32:53 PM  
**To:** Jim A. Rutherford [jaruth@kalcounty.com]  
**CC:** Jeffrey Kimble [Kimble.Jeffrey@epa.gov]  
**Subject:** RE: PFAS PRP's Accountability

Hi Jim,

I intend to discuss how best to respond to your request more with some others at EPA Region 5 once the government shutdown situation clears up. In particular, I will try to make appropriate contacts in our Water Division and get you some contact information for them and provide yours to them. They are the program at EPA with lead responsibility to work with state and local on protection of drinking water. Jeff and I may also be able to facilitate some dialogue with them--perhaps by setting up a conference call with you and other local officials. It might be helpful if we can share this correspondence with them. Please let us know if that's ok.

As you state below, EPA's Superfund authorities are currently limited when it comes to PFAS. That said, there may be other, non-Superfund authorities that potentially apply to the Parchment/Cooper Township situation. I'm attaching a link to an EPA document which outlines prospective EPA actions under the Safe Drinking Water Act (SDWA). This is a public document and you are free to share it with other local officials or anyone else who may be interested. I think it contains a lot of good information that could help to inform the ongoing dialogue among Parchment/Cooper Twp. Officials, MDEQ and others concerned about further resolution of the safe drinking water issues in Kalamazoo County that you describe.

Please let me know if you have additional questions. Jeff and I also intend to continue participation in the weekly, all-agency calls. The link is below.

<https://www.epa.gov/sites/production/files/2018-09/documents/updatedguidanceonemergencyauthorityundersection1431sdwa.pdf>

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**From:** Jim A. Rutherford <jaruth@kalcounty.com>  
**Sent:** Friday, December 21, 2018 1:41 PM  
**To:** Dollhopf, Ralph <Dollhopf.Ralph@epa.gov>  
**Subject:** PFAS PRP's Accountability

Ralph,

As I have indicated to you in previous conversations, I am searching for options at the local level to be able to help assure that Potentially Responsible Parties, (PRPs) are held accountable as it relates to per and polyfluoroalkyl, (PFAS) Contamination incidents.

As you are aware, both the City of Parchment and Cooper Township which are located within my county have been dealing with a significant PFAS contamination response over the past several months. This incident has dramatically impacted the residents within both of these jurisdictions. In addition to having to permanently abandon the Parchment Municipal Water Supply that provided water to thousands of residents, many residents have been put on bottle water and/or water filtration units indefinitely.

While quick and fortunate access to the contiguous Kalamazoo Water Supply System has relieved some of the immediate burdens to the residents in the City of Parchment, many residents, particularly within Cooper Township that

don't have the resources to be able to construct the necessary infrastructure and pay for the hook-up into the Kalamazoo Municipal Supply continue to struggle. It is estimated that it will cost close to \$7-million dollars to be able to get all of the residents in Cooper Township and in the City of Parchment onto municipal water.

I am aware that PFAS substances are not yet identified as hazardous substances under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). That being said, I am inquiring about the type and level of involvement that the EPA could provide to assist the Michigan Department of Environmental Quality and local municipalities to be able to identify, hold accountable and help recover cost from PFAS PRP's in a timely manner.

Thanks in advance for any insight that you may be able to provide.

**James A. Rutherford, Health Officer/Director**

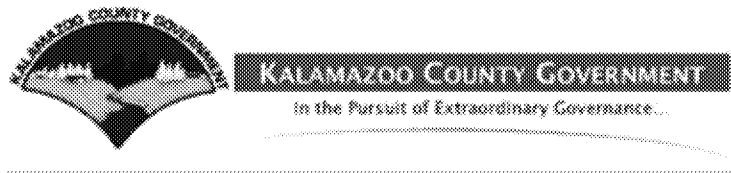
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